

EXHIBIT

B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF DOUGLAS W. ANDERSON

I, Douglas W. Anderson, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center ("WTC") Towers occurred. At the time of these horrific attacks, I worked as a firefighter for the Fire Department of New York (FDNY) as part of Ladder 2.

4. I had not been scheduled to work with Ladder 2 on the morning of 9/11. But when I learned that the first passenger jet had struck the North Tower, I immediately drove towards my assigned firehouse to see how I could assist with the emergency at the World Trade Center.

5. Moments before the South Tower collapsed and while en route to my firehouse, I was stopped by Port Authority officers at the entrance to the Battery Tunnel. A huge cloud of dust

and building debris came out of the Brooklyn side of the Battery Tunnel and surrounded me, and I inhaled large quantities of these toxins into my lungs and air passages.

6. I saw several people walking out of the Battery Tunnel who were in severe medical distress from the events at the World Trade Center, so I provided medical treatment to as many victims as possible. I then caught a ride with an unknown group of firefighters who were headed over the Brooklyn Bridge despite the fact that I was in distress from the toxins I had inhaled just minutes before.

7. I arrived at my midtown firehouse to grab my gear, and I traveled in an FDNY van to an area just north of the World Trade Center. By this time, the North Tower had also collapsed, but my team of firefighters entered the area at Ground Zero to rescue as many people as possible. Despite my injuries, I worked in the area until after midnight to assist with the many victims. The area resembled a war zone, and I was surrounded by death and destruction.

8. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: serious inhalation injuries due to the large quantities of dust and debris that I inhaled, including an upper respiratory disease¹, obstructive airway disease², GERD with esophagitis³, chronic rhinosinusitis⁴, obstructive sleep apnea⁵, chronic tracheitis⁶, dyspnea⁷, a chronic cough⁸, asthma⁹, COPD¹⁰, chronic sinusitis¹¹, a deviated septum¹², and bronchitis¹³.

¹ See, Medical Records of Douglas W. Anderson (ANDERSON_MEDS_000001), attached hereto as Exhibit B, at 0004, 0026, 0027, 0029, and 0043.

² *Id.* at 0001, 0002, 0004, 0027, 0044, 0045, 0047, 0048 and 0051.

³ *Id.* at 0001, 0002, 0004, 0022, 0027, 0028, 0032, 0037, 0038, 0040, 0042, 0046, and 0049-0052.

⁴ *Id.* at 0004, 0010, 0012, 0034, 0049, 0051, and 0052.

⁵ *Id.* at 0003, 0005, 0008, 0009, 0012, 0014, 0017, 0020, 0021, 0032, 0049, and 0052.

⁶ *Id.* at 0037, 0040, 0042, 0049, 0050, and 0052.

⁷ *Id.* at 0006, 0019-0022, 0030, 0048, and 0049.

⁸ *Id.* at 0021, 0022, 0027, 0028, 0030, 0041, 0048, and 0051.

⁹ *Id.* at 0044, 0045, and 0047-0050.

¹⁰ *Id.* at 0049.

¹¹ *Id.* at 0049.

¹² *Id.* at 0012, 0033-0035, and 0049.

¹³ *Id.* at 0027, 0028, 0031, 0032, 0039, 0041, 0043, and 0044.

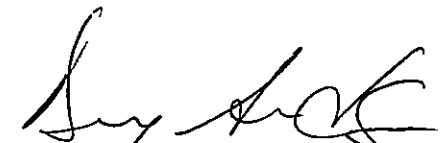
Lastly, I have been diagnosed with post-traumatic stress disorder¹⁴ due to the horrific events that I witnessed on 9/11.

9. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

10. I previously pursued a claim (VCF Number Unknown) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claims were determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 12th day of March 2022.


Declarant Douglas W. Anderson

¹⁴ *Id.* at 0001, 0002, and 0004.

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**